IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBITS ATTACHED HERETO

JOINT MOTION TO DISMISS DEFENDANT COLOPLAST CORP. WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and defendant Coloplast Corp. ("Coloplast") advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Coloplast jointly move the court to dismiss Coloplast as a defendant in this action with prejudice, and terminate Coloplast from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute their actions against them.

Respectfully:

/s/ Lana K. Varney
LANA K. VARNEY
Norton Rose Fulbright US LLP
98 San Jacinto Boulevard
Suite 1100
Austin, Texas 78701-4255
512-536-4594
lana.varney@nortonrosefulbright.com
ATTORNEYS FOR DEFENDANT

/s/ P. Leigh O'Dell
P. LEIGH O'DELL
Beasley, Allen, Crow, Methvin,
Portis, & Miles,
P. O. Box. 4160
Montgomery, AL 36103-4160
334-269-2343
leigh.odell@beasleyallen.com
ATTORNEYS FOR PLAINITFFS

Dated: November 13, 2015

EXHIBIT A - BEASLEY ALLEN CROW METHVIN PORTIS & MILES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-04055	Bonnie Spell, et al. v. Ethicon, Inc., et al.
2:13-cv-11916	Linda Reeves v. Ethicon, Inc. et al

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ Lana K. Varney